

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

UNITED STATES OF AMERICA

v.

DALONTE RAY JONES,

Defendant.

CASE NO: BAH-25-32

**GOVERNMENT’S MOTION TO ADMIT EVIDENCE PURSUANT TO RULE 404(B),
AND AS INTRINSIC EVIDENCE TO THE CHARGED COUNT**

The United States hereby files a motion for a pretrial ruling regarding the admission of evidence at trial pursuant to Rule 404(b) of the Federal Rules of Evidence.

The government seeks to introduce various prior acts by the defendant at trial, including:

1. The defendant’s assault of a female on November 11, 2024, while in possession of the 9mm Glock with a forty-five round capacity extended magazine listed in the indictment;
2. The defendant’s conviction for second degree assault of a female on October 21, 2022;
3. The defendant’s conviction for second degree assault of a female on November 11, 2022;
4. The defendant’s possession of the 9mm Glock with a forty-five round capacity extended magazine listed in the indictment on dates other than the date listed in the indictment, including on June 9, 2024, July 21, 2024, and September 12, 2024;
5. The defendant’s possession of firearms other than the handgun listed in the indictment, including semi-automatic handguns and an AR-style pistol on dates other than the date listed in the indictment, dates of possession occurring on multiple occasions from 2023 until November 2024, including June 9, 2024, July 21, 2024, and September 12, 2024; and
6. Videos and images from the defendant’s phone depicting the defendant in possession of the firearms listed above.

The government submits that the defendant’s prior conduct and convictions listed above are admissible under Rule 404(b) as evidence of the defendant’s modus operandi, intent, motive,

planning, and the absence of mistake with respect to the very similar allegations in the indictment. Furthermore, much of the evidence listed above is intrinsic to the charged offenses, and is necessary to complete the story of the crime on trial. As such, proof of these incidents is relevant to the matters at trial.


Accordingly, the government respectfully requests that this Court grant its motion to admit Rule 404(b) evidence concerning the defendant's prior possession, purchase, and interest in firearms and ammunition.¹

CONCLUSION

For all of the foregoing reasons, the United States respectfully requests that this Court permit the admission of this evidence at trial.

Respectfully submitted,

Philip A. Selden
Acting United States Attorney

By: 
Paul E. Budlow
Assistant United States Attorney

¹ The government will submit a memorandum in support of this motion prior to trial.